



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604**

DATE: JUL 17 2018
SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Highwater Ethanol, LLC
FROM: Gregory Gehrig, Environmental Engineer
AECAB (MI/WI)
THRU: Sarah Marshall, Section Chief
AECAB (MI/WI)
TO: File

BASIC INFORMATION

Facility Name: Highwater Ethanol, LLC

Facility Location: 24500 US Highway 14, Lamberton, MN

Date of Inspection: June 29, 2018

Lead Inspector: Gregory Gehrig, Environmental Engineer

Other Attendees: From Highwater Ethanol, LLC: Lisa Landkammer, Environmental Health & Safety Manager; Shane Rasset, Plant Manager; Brian Kletscher, CEO/GM.

Contact Email: lisa.landkammer@highwaterethanol.com

Purpose of Inspection: CAA Compliance

Facility Type: Ethanol production from corn

Regulations Central to Inspection: SIP, NSPS and MACT

Arrival Time: 1310 hrs

Departure Time: 1440 hrs

Inspection Type:

- ☒ Unannounced Inspection
☐ Announced Inspection

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OPENING CONFERENCE

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from facility personnel.

Company Ownership: Same ownership since at least 2011.

Process Description:

Highwater Ethanol, LLC (Highwater) is permitted to produce 58 million gallons per year of ethanol from corn. They also produce distillers dried grains (DDGS). The facility was designed by ICM. They have four fermentors, one beer well and one associated scrubber for pollution control. Highwater uses one recuperative thermal oxidizer (RTO) to control emissions from the mash drying operations conducted to DDGS. They load out denatured ethanol via both rail and tank wagon, although mostly by rail.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:

FLIR video was taken of VOC emission points and possible VOC emission points. Highwater was operating normally during the facility tour. The following was observed during the tour:

- Control room, where pollution control readings were collected.
- Scrubber, which was operating at a pressure differential of 6.9 inches of water, a flow of 55 gallon per minute of water, additive flow rate of 1.0 gallon per hour, and a blower inlet pressure of 7.8 inches of water.
- Fermentors and beer well, where VOCs were observed venting uncontrolled from some pressure release conservation valves (PRCVs) and agitators.
- Distillation/molecular sieves.
- Product storage tanks and denaturant storage tank.
- RTO, which was operating at 1,469 °F.

Field Measurements: were not taken during this inspection.

RECORDS REVIEW

- Monthly LDAR report conducted June 11, 2018 (taken)
- Facility diagram (taken)

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CLOSING CONFERENCE

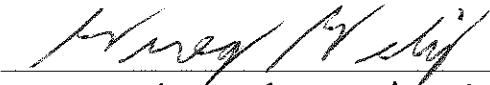
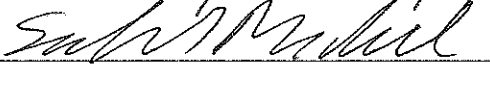
Requested documents:

- None

Compliance Assistance: EPA indicated that Highwater should fully investigate and mitigate uncontrolled venting from PRCVs and agitators on top of the fermentors.

Concerns: None

SIGNATURES

Lead Inspector:  Date: 7-16-18
Section Chief:  Date: 7/17/18

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APPENDIX A: DIGITAL IMAGE LOG

1. Inspector Name: Gregory Gehrig	2. Date(s) of Inspection: June 29, 2018
3. Company/Facility Name: Highwater Ethanol, LLC	4. Street Address, City, State: 24500 US Highway 14, Lamberton, MN
5. Number of Images: 2	6. Archival Record Location: CD-R labeled Highwater Images 6.29.2018

Image name	Date and Time (CDT)	Description
MOV_2190	June 29, 2018 at 1411	FLIR video of scrubber outlet; components on beer well; venting agitators and PRCVs on Ferm #1, Ferm #2, and Ferm #4.
MOV_2191	June 29, 2018 at 1422	FLIR video of venting agitators and PRCVs on Ferm #4; and venting agitator on Ferm #3.